



9.3.3
4-17-06

April 17, 2006

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

RE: Monthly Reports: No. 118, March 2006
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Asarco is submitting this monthly report per the requirements of paragraph 48. of the Consent Decree for the above referenced site. The report is organized to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Aldrich for".

Thomas L. Aldrich
V.P., Environmental Affairs

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Glen Vadera - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay



RECEIVED

APR 18 2006

Environmental Cleanup Office

Monthly Report No. 118, March 2006

Operable Unit 02

Asarco Tacoma Smelter Site

A. Actions taken to achieve compliance with the Consent Decree during the previous month.

1. A regular monthly design review meeting was not held in March.
2. Remedial Design continued. Remaining design elements are incorporated into the Tacoma Upland Remediation Design – Grade and Cap Site and Breakwater Peninsula.
3. Remedial Action activities continued.

B. Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.

1. Outfall activities including the following:

Section 2.6.1 of the Statement of Work (SOW) requires Asarco to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm. EPA and Asarco met on April 17, 2003 to discuss monitoring at the Tacoma Smelter site. The following changes to the outfall monitoring program were agreed to on an interim bases:

Sampling at the Middle Outfall was discontinued. Flows to this outfall have been re-routed to the North Outfall. Remaining seepage out of the Middle Outfall is too low to measure and does not provide accurate water quality results. Sampling at the North and South outfalls will continue through RA. Weekly composite samples (instead of daily composite samples) will be collected at each of these outfalls during the construction season. During the winter season, outfall samples will be collected every other month. The following schedule began in May of 2003. Weekly composite samples will be collected during the following months: May-October, December, February, and April. Results for samples collected in February are attached.

2. OCF leachate is currently collected in a Baker tank for offsite disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OMMP. LCRS volumes during March averaged 266. This rate indicates a steady decline from 411 gallons per day at the end of July 2005 when the cover system was installed. The flow meter for the LDCRS pump system was repaired during February 2006. The volume of seepage to the LDCRS during a weekly monitoring period does not exceed the level required to activate the pump. Over a 26 day period 5 gallons of flow (0.2 gallons per day) was pumped from the LDCRS. This rate is well below the post closure action leakage rate for the LDCRS (2 gallons per day). On March 17, the pump was manually activated in order to confirm operation.

RECEIVED

APR 18 2006

Environmental Cleanup Office

Manual operation of the pump was initiated during subsequent monitoring events. This approach was found to result in inconsistent flow data due to variability in the pump shut off level. The practice of manually activating the pump has been discontinued until alternative methods are considered.

Leachate collected in the Baker tank was sampled on March 16th. Results showed the 5.5 mg/L arsenic. Leachate pumped from the Baker tank and shipped for offsite disposal at Chemical Waste Management Northwest in Arlington, OR. 5,000 gallons were shipped on March 27th and 5,300 gallons were shipped on March 29th.

B. Work Plans and other deliverables completed and submitted during the previous month.

1. No new comments were received from EPA during the month of March.
2. Final Smelter site remediation design continued in March.
3. Remedial Action during March included the following tasks:
 - OCF construction activities:
 - Areas of the lower vault that appeared to be leaking, as reported to EPA in February, were resealed. The electrical components in the lower vault were tested and repaired as necessary.
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary Baker storage tank.
 - Source Area construction activities:
 - Maintained erosion and surface water controls
 - Site Capping construction activities:
 - Maintained subgrade areas at the site
 - Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
 - Water Treatment System:
 - Continued to collect water in baker tank for offsite disposal

D. Actions scheduled for the next six weeks.

1. Remedial design will continue.
2. Asarco expects to receive comments from EPA on the following submittals:
 - None expected.
3. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - Semi-annual monitoring will be completed in April

Monthly Report No. 118, March 2006

Operable Unit 02

Asarco Tacoma Smelter Site

- OCF construction activities:
 - Continue collection of leachate in baker tank for offsite disposal
 - Continue monitoring of leachate volumes
 - Continue to inspect lower vault for leaks
- Source Area construction activities:
 - Erosion controls and site maintenance
- Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
- Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Group 1 Preliminary Design tasks are 100% complete; Intermediate Design is 100% complete; Final Design is about 98% complete.
2. Group 2 Preliminary Design is about 100% complete; Intermediate Design is essentially complete, Final Design is about 95% complete.
3. Surface water evaluation is about 98% complete.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. Schedule revisions may be necessary because the RD schedule in the Remedial Design Reports (RDRs) anticipated Consent Decree lodging in April 1996. The current RD Schedule (Final Revision 1) was prepared in September 1996 and is part of the RD Work Plan.
2. Asarco is currently working per Revision 8 of the RD schedule as discussed with EPA during the May 23, 2000 RD meeting.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Meetings held in March:
 - Asarco attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA activities (1st and 3rd Monday of each month).

Table 1 - Feb 06

Table 1. Summary of February 2006 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*	Avg. Flow Gal/Min
South Outfall	0.068	13.55%	0.046	9.15%	0.085	17.00%	**
North Outfall **	0.051	10.20%	0.030	6.00%	0.033	6.50%	**

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.

** Equipment Malfunction - estimated flow at 180.5 gallons using December 2004 average